

UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

2005 OCT 11 A 11:28

U.S. DISTRICT COURT  
DISTRICT OF MASS.

Albert William Bleau Jr.

Plaintiff

Vs.

Greater Lynn Mental Health  
& Retardation Association, et al,

Defendants

Civil Action  
No. 04 – 10469REK

**Additional Amendment to Plaintiff's**

**Objection To Defendant Greater Lynn Mental Health & Retardation  
Association, Inc Motion of August 9, 2005 To Dismiss Plaintiff's Breach Of  
Contract Claim or For Partial Summary Judgment**

**And**

**Plaintiff Albert W. Bleau Jr. Motion for Summary Judgment Of Breach Of  
Contract Claim & To Continue And Expand Discovery To Include Damages  
and Rescission**

Plaintiff Albert W. Bleau Jr. objected to defendant Greater Lynn Mental Health & Retardation Association's motion for dismissal or partial summary judgment of plaintiff's claim for breach of contract in an Objection filed on August 29, 2005.

Additionally, on August 29, 2005, the Plaintiff, in the alternative moved that the Court grant the Plaintiff's motion for summary judgment on his breach of contract claim.

Plaintiff also requested that discovery be ordered to assess damages on the breach of contract claim and on a possible claim for rescission and that discovery expand to include grounds for contract rescission and continue on all outstanding issues and that discovery include pre November 2000 actions of the defendants to determine claims and damages on all outstanding issues including defamation

and ADA and justification for rescission.

In support of his objection and his motions, Albert W. Bleau Jr. submitted an accompanying memorandum of law and Local Rule 56.1 Concise Statement of Material Facts and an objection to Defendant's August 9, 2005 Local Rule 56.1 Statement.

Plaintiff also submitted an additional motion and objection on October 4, 2005 with an additional accompanying Memorandum of Law and an additional Local Rule 56.1 Concise Statement of Material Facts that amended plaintiff's August 29, 2005 Local Rule 56.1 Concise Statement of Material Facts.

Plaintiff now requests that the Court enter an order to change the defendant from Greater Lynn Mental Health and Retardation Association, Inc. and to change its corporate address to include their new name and corporate address. Their new corporate name is Bridgewell and their new corporate address is 471 Broadway, Lynnfield, Massachusetts.

Plaintiff also requests that the Court enter an order prohibiting Bridgewell, and Greater Lynn Mental Health and Retardation Association, Inc., from transferring, selling or mortgaging any assets other than what is needed to pay for their normal business operations as outlined and approved in their current state private and federal contracts and budgets and that Bridgewell be ordered not to incur any additional liabilities without the approval of the Court.

Plaintiff now submits an additional accompanying Memorandum of Law that amends plaintiff's October 4, 2005 Memorandum and an additional Local Rule 56.1 Concise Statement of Material Facts that amends plaintiff's October 4, 2005 Local Rule 56.1 Concise Statement of Material Facts.

Respectfully submitted,

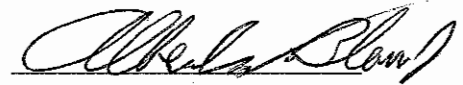


Albert W. Bleau Jr.  
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Dated: October 11, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy  
of the above document was  
served upon all counsel of record  
by First Class Mail on October  
11, 2005.



Albert W. Bleau Jr.